

REMARKS

In response to the Office Action dated June 11, 2008, the Assignee respectfully requests reconsideration based on the above amendments and on the following remarks.

Claims 1, 4-7, 17-20, 23, and 25-34 are pending in this application. Claims 2-3, 8-16, 21-22, and 35-52 were previously canceled with prejudice or disclaimer.

Rejection of Claims 1, 17 & 26 under 35 U.S.C. § 112

The Office rejects claims 1, 17, and 26 under 35 U.S.C. § 112, first paragraph. “To comply with the written description requirement ..., each claim limitation must be expressly, implicitly, or inherently supported in the originally filed disclosure.” Department of Commerce, Manual of Patent Examining Procedure § 2163 (II) (3) (b) (Rev. 1, Feb. 2003) (hereinafter “M.P.E.P.”). Here the Office alleges that the specification fails to support several claimed features.

The Assignee, very respectfully, disagrees. The Assignee strongly asserts that the written description requirement is completely satisfied. The Office, for example, alleges that the specification fails to support “*a cipher/decipher circuit connected to the decoder circuit and connected to the analog-to-digital converter that deciphers the digital information from the analog-to-digital converter and deciphers the converted decrypted information signal from the decoder circuit.*” Yet FIG. 6 of the as-filed specification illustrates a cipher/decipher circuit (reference numeral 628) connected to a decoder circuit (reference numeral 126) and connected to an analog-to-digital converter (reference numeral 125). One of ordinary skill in the art would easily understand, then, that the cipher/decipher circuit “*deciphers the digital information from the analog-to-digital converter and deciphers the converted decrypted information signal from the decoder circuit.*” The Assignee, then, respectfully submits that these claimed features are expressly, implicitly, or inherently supported by the as-filed specification.

Other features are fully supported. FIG. 6 also illustrates *“the system data bus connected to the media bus and configured to only receive the deciphered information signals from the media bus, the system data bus unable to send information to the media bus.”* FIG. 6 clearly illustrates a one-way arrow connecting the media bus 610 to the system data bus 620. The application explains that the “signal processing circuit 120 and media bus 610 are coupled via system cipher/decipher logic 628” and that the “[s]ystem data bus 620 can be coupled to the media bus 610 to receive information signals.” See U.S. Application 09/749,826 to Hicks at page 23, lines 5-7. The one-way arrow conveys to one of ordinary skill in the art that *“the system data bus connected to the media bus and configured to only receive the deciphered information signals from the media bus, the system data bus unable to send information to the media bus.”* The Assignee, then, respectfully submits that these claimed features are expressly, implicitly, or inherently supported by the as-filed specification.

FIG. 6 also supports the claimed *“wherein data switch information from the data switch communicates from the network bus to the system data bus, but the data switch information is prevented from communicating to the media bus.”* FIG. 6 illustrates a one-way arrow connecting the network bus 615 to the system data bus 620. The one-way arrow conveys to one of ordinary skill in the art that the *“data switch information from the data switch communicates from the network bus to the system data bus.”* As explained above, however, FIG. 6 also illustrates a one-way arrow connecting the media bus 610 to the system data bus 620. This one-way arrow would convey to one of ordinary skill in the art that the data switch information cannot pass from the system data bus 620 to the media bus 610. That is, because data may only pass from the media bus 610 to the system data bus 620, the *“data switch information is prevented from communicating to the media bus.”* The Assignee, then, respectfully submits that these claimed features are expressly, implicitly, or inherently supported by the as-filed specification.

Rejection of Claims 1 & 5-7 under 35 U.S.C. § 103 (a)

The Office rejected claims 1 and 5-7 under 35 U.S.C. § 103 (a) as being unpatentable over U.S. Patent 6,889,385 to Rakib, *et al.* in view of U.S. Patent Application Publication

2003/0192053 to Sheppard, *et al.*, further in view of U.S. Patent 6,839,902 to Hirota, and further in view of U.S. Patent Application Publication 2004/0175120 to Arsenault, *et al.*

Claims 1 and 5-7, however, cannot be obvious over the proposed combination of *Rakib, Sheppard, Hirota, and Arsenault*. These claims recite, or incorporate, features that are not taught or suggested by *Rakib, Sheppard, Hirota, and Arsenault*. Independent claim 1, for example, recites “a browser-based graphical user interface stored in the memory.” Support for such features may found at least at page 8, lines 7-18 and at page 18, lines 13-23 of the as-filed application. Independent claim 1 also recites “the processor automatically downloads and stores content items to the memory.” Support for such features may found at least at page 3, lines 12-18 and at page 25, line 23 through page 26, line 20 of the as-filed application. Independent claim 1 also recites “the processor receiving an instruction to retrieve the graphical user interface from the memory” and “the processor sending the graphical user interface to a client device with the graphical user interface describing the content items stored in the memory of the residential gateway.” Support for such features may found at least at page 18, lines 13-23 and at page 22, lines 14-23 of the as-filed application.

The combined teaching of *Rakib, Sheppard, Hirota, and Arsenault* does not teach or suggest all these features. *Rakib* discloses a modular gateway that uses plug-in modules to interface with different delivery networks. See U.S. Patent Application Publication 2004/0172658 to *Rakib, et al.* at paragraph [0022]. *Id.* at paragraph [0023]. The Office alleges that *Sheppard* discloses a video processor with multiple bus architecture. The Office alleges that *Hirota* discloses a decoder circuit and that *Arsenault* discloses another processor and bus architecture. Still, though, the combined teaching of *Rakib, Sheppard, Hirota, and Arsenault* fails to teach or suggest “a browser-based graphical user interface stored in the memory” and “the processor automatically downloads and stores content items to the memory.” The combined teaching of *Rakib, Sheppard, Hirota, and Arsenault* also fails to teach or suggest “the processor receiving an instruction to retrieve the graphical user interface from the memory” and “the processor sending the graphical user interface to a client device with the graphical user interface describing the content items stored in the memory of the residential gateway.” Because the combined teaching of *Rakib, Sheppard, Hirota, and Arsenault* fails to teach or suggest all

these features, one of ordinary skill in the art would not think that independent claim 1 is obvious.

Moreover, independent claim 1 recites even more distinguishing features. Independent claim 1 recites “*the system data bus connected to the media bus and configured to only receive the deciphered information signals from the media bus, the system data bus unable to send information to the media bus.*” Even though *Sheppard* may disclose a video processor with multiple bus architecture, the combined teaching of *Rakib*, *Sheppard*, *Hirota*, and *Arsenault* does not teach or suggest all these features. One of ordinary skill in the art, then, would not think that independent claim 1 is obvious.

Claims 1 and 5-7, then, are not obvious over the proposed combination of *Rakib*, *Sheppard*, *Hirota*, and *Arsenault*. Independent claim 1 recites features that are not disclosed or suggested by *Rakib*, *Sheppard*, *Hirota*, and *Arsenault*. The dependent claims incorporate these same features and recite additional features. Claims 1 and 5-7, then, cannot be obvious, so the Office is respectfully requested to remove the § 103 (a) rejection of these claims.

Rejection of Claims 17-19 & 25-33

The Office rejected claims 17-19 and 25-33 under 35 U.S.C. § 103 (a) as being unpatentable over *Rakib*, *Sheppard*, *Hirota*, and *Arsenault* in view of U.S. Patent 6,732,366 to Russo and further in view of U.S. Patent 5,790,176 to Craig.

Again, though, claims 17-19 and 25-33 are not obvious over *Rakib*, *Sheppard*, *Hirota*, *Arsenault*, *Russo*, and *Craig*. These claims recite, or incorporate, features that are not taught or suggested by the proposed combination of *Rakib*, *Sheppard*, *Hirota*, *Arsenault*, *Russo*, and *Craig*. Both independent claims 17 and 26, for example, recite similar features as discussed above with reference to independent claim 1. As the above paragraphs explained, *Rakib*, *Sheppard*, *Hirota*, and *Arsenault* do not teach or suggest all the features of independent claim 1, and the added teachings of *Russo* and *Craig* does not cure these deficiencies. Both *Russo* and *Craig* have been thoroughly discussed in the record, so no further explanation is needed. The

combined teaching of *Rakib, Sheppard, Hirota, Arsenault, Russo, and Craig*, for example, fails to teach or suggest “*storing a browser-based graphical user interface in memory*” and “*automatically downloading and storing content items to the memory*,” as independent claim 17 recites. The combined teaching of *Rakib, Sheppard, Hirota, Arsenault, Russo, and Craig* also fails to teach or suggest “*receiving an instruction to retrieve the graphical user interface from the memory*” and “*sending the graphical user interface to a client device with the graphical user interface describing the content items stored in the memory*.” One of ordinary skill in the art, then, would not think that independent claims 17 and 26 are obvious.

Moreover, independent claims 17 and 26 recite even more distinguishing features. Independent claims 17 and 26 recite “*the system data bus connected to the media bus and configured to only receive the deciphered information signals from the media bus, the system data bus unable to send information to the media bus*.” As the above paragraphs explained, even though *Sheppard* may disclose a video processor with multiple bus architecture, the combined teaching of *Rakib, Sheppard, Hirota, Arsenault, Russo, and Craig* does not teach or suggest all these features. One of ordinary skill in the art, then, would not think that independent claims 17 and 26 are obvious.

Claims 17-19 and 25-33, then, are not obvious over *Rakib, Sheppard, Hirota, Arsenault, Russo, and Craig*. Independent claims 17 and 26 recite features that are not disclosed or suggested by *Rakib, Sheppard, Hirota, Arsenault, Russo, and Craig*. The dependent claims incorporate these same features and recite additional features. Because *Rakib, Sheppard, Hirota, Arsenault, Russo, and Craig* are all silent to at least these features, one of ordinary skill in the art would not think that claims 17-19 and 25-33 are obvious. These claims, then, cannot be obvious over *Rakib, Sheppard, Hirota, Arsenault, Russo, and Craig*, so the Office is respectfully requested to remove the § 103 (a) rejection of claims 17-19 and 25-33.

Rejection of Claim 4

The Office rejected claim 4 under 35 U.S.C. § 103 (a) as being unpatentable over *Rakib, Sheppard, Hirota, and Arsenault* and further in view of U.S. Patent Application Publication

2002/0118954 to Barton, *et al.* Barton has been previously discussed in the record and need not be further explained.

Claim 4, though, is not obvious over *Rakib, Sheppard, Hirota, Arsenault, and Barton*. Claim 4 depends from independent claim 1 and, thus incorporates the same distinguishing features. As the above paragraphs explained, *Rakib, Sheppard, Hirota, and Arsenault* are silent to many of independent claim 1's features, and *Barton* does not cure these deficiencies. Because the proposed combination of *Rakib, Sheppard, Hirota, Arsenault, and Barton* is silent to many of the features recited by independent claim 1, one of ordinary skill in the art would not think that claim 4 is obvious. The Office is thus respectfully requested to remove the § 103 (a) rejection of claim 4.

Rejection of Claims 20 & 34

The Office rejected claims 20 and 34 under 35 U.S.C. § 103 (a) as being unpatentable over *Rakib, Sheppard, Hirota, Arsenault, Russo, and Craig* in view of *Barton*. Claims 20 and 34, though, depend, respectively, from independent claims 17 and 26. Claims 20 and 34 thus incorporate the same distinguishing features that are discussed above. Because the proposed combination of *Rakib, Sheppard, Hirota, Arsenault, Russo, Craig, and Barton* is silent to many of the features recited by independent claims 17 and 26, one of ordinary skill in the art would not think that claims 20 and 34 are obvious. The Office is thus respectfully requested to remove the § 103 (a) rejection of claims 20 and 34.

If any issues remain outstanding, the Office is requested to contact the undersigned at (919) 469-2629 or scott@scottzimmerman.com.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Scott P. Zimmerman". The signature is stylized with large, sweeping loops and a prominent vertical stroke in the center.

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